

**U.S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

FOURTH SUPPLEMENTAL DECLARATION OF
THOMAS SCHOENBERGER

The undersigned, Thomas Schoenberger, swears that the following declaration is true under the penalties of perjury. The undersigned presently resides in the State of Utah.

The undersigned provides this statement as a truthful declaration in support of the Plaintiff's response to a so-called "Anti-SLAPP" motion filed by the Defendant known as "ECF document 239".

The undersigned has reviewed a document of this Court known as "ECF document no. 242". The undersigned avers that said document includes e-mail message headers from e-mail messages exchanged between the undersigned and Manuel Chavez, III.

The undersigned avers that he has exchanged e-mail messages using the e-mail address TSTGER13@gmail.com. The undersigned avers that in years past these were a regular practice of exchanging e-mail messages with Mr. Chavez at the e-mail address DEFANGO@gmail.com.

The undersigned avers that the undersigned shared a hotel room in the metropolitan area of Dallas, Texas with Mr. Chavez, who is also known as "DEFANGO" in social media domains.

The undersigned avers that the undersigned maintained close contact with Mr. Chavez during this time in Dallas, Texas in the period of January 29, 2018 to April 2, 2018. The undersigned refers to this as “Dallas hotel time”.

The undersigned avers that during this “Dallas hotel time” the undersigned never observed Mr. Chavez communicating via telephone, cell phone, or e-mail messaging with the Plaintiff. During this “Dallas hotel time” the undersigned avers that Mr. Chavez never spoke of communicating with the Plaintiff in this lawsuit.

The undersigned avers that during this “Dallas hotel time” Mr. Chavez did receive a lengthy telephone call from the Defendant in this lawsuit.

The undersigned avers that the undersigned did receive a telephone call from Mr. Chavez, at a later date, that Mr. Chavez was standing outside the apartment building of the Defendant.

The undersigned avers that the e-mail address for Beth “Blackburn” Bogaerts as displayed in “ECF document 242” appears correct and an e-mail address for which the undersigned exchanged e-mail messages.

The undersigned avers that Beth “Blackburn” Bogaerts and Mr. Chavez, III were associates, and/or affiliates of a business start-up venture known as SHADOWBOX STRATEGIES” as incorporated in the State of Delaware.

The undersigned avers that the undersigned has not received any communications from Ms. Bogaerts indicting any association or collaboration with the Plaintiff.

The undersigned avers that the e-mail address for Robert David Steele as displayed in “ECF document 242” appears correct and an e-mail address for which the undersigned exchanged e-mail messages.

The undersigned avers that the undersigned has not received any communications from Mr. Steele indicting any association or collaboration with the Plaintiff.

The undersigned avers that the e-mail address for Steven Biss, esq. as displayed in “ECF document 242” appears correct and an e-mail address for which the undersigned exchanged e-mail messages.

The undersigned avers that the undersigned has not received any communications from Mr. Biss indicting any association or collaboration with the Plaintiff.

The undersigned avers that the e-mail address for Tanya Cornwell as displayed in “ECF document 242” appears correct and an e-mail address for which the undersigned exchanged e-mail messages.

The undersigned avers that the undersigned has not received any communications from Tanya Cornwell indicting any association or collaboration with the Plaintiff.

The undersigned avers that the e-mail address for Nathan Stolpman as displayed in “ECF document 242” appears correct and an e-mail address for which the undersigned exchanged e-mail messages.

The undersigned avers that the undersigned has not received any communications from Nathan Stolpman indicting any association or collaboration with the Plaintiff.

The undersigned avers that the e-mail address for Dean Fougere as displayed in “ECF document 242” appears correct and an e-mail address for which the undersigned exchanged e-mail messages.

The undersigned avers that the undersigned has not received any communications from Mr. Fougere indicting any association or collaboration with the Plaintiff.

The undersigned avers that the e-mail address for Tyroan Simpson, as displayed in “ECF document 242” appears correct and an e-mail address for which the undersigned exchanged e-mail messages.

The undersigned avers that the undersigned has not received any communications from Tyroan Simpson indicting any association or collaboration with the Plaintiff.

The undersigned avers that the e-mail address for Manuel Chavez, III as displayed in “ECF document 242” appears correct and an e-mail address for which the undersigned exchanged e-mail messages.

The undersigned avers that the undersigned has not received any communications from Mr. Chavez indicting any association or collaboration with the Plaintiff.

Except of the e-mail messages exchanged related to the preparation of this document, for the purposes of this legal document, the undersigned has not exchanged e-mail messages with the Plaintiff about matters related to the Defendant.

The undersigned avers that the Defendant, whose e-mail address appears in “ECF document 242” received copies of the e-mail messages exchanged for the creation of this legal document.

The undersigned avers that the undersigned is not working on a team, in an association, or in a collaboration with other to harm the Defendant financially through legal proceedings, social media messaging other by other means. Signed this thirteenth day of April (4/13), 2021.

Respectfully,

/s/ Thomas Schoenberger

THOMAS SCHOENBERGER

Thomas Schoenberger
Provo, Utah

CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the thirteenth day of April (4/13), two thousand and twenty-one (2021).

Clerk of the Court, Room 200 temporary_pro_se_filing@nysd.uscourts.gov	Jason Goodman, CEO truth@crowdsourcethetruth.org
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